

**Mitchell Law Offices
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Attorney for Debtor(s)**

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re:

Case No. 15-32741-MBK

Anthony Van Herk &
Kim Van Herk

Debtor(s)

**Opposition to Standing Trustee's
Certification of Default**

Douglas G. Mitchell, Esq., by way of opposition to the Trustee's Certification in Support, respectfully opposes as follows:

I am the attorney representing Debtor(s) Anthony Van Herk & Kim Van Herk

1. Debtor(s) were approved for a loan modification on or about December 15, 2016.
2. Debtors are in the process of submitting final documents for said loan modification.
3. Debtors are continuing to pay adequate protection to Nationstar Bank, the secured creditor mortgage holder.
4. Debtor requires continued bankruptcy protection and will face irreparable harm if her case is dismissed, namely the sale of his/her home at auction.
5. Debtor continues/will continue to make plan payments as required under bankruptcy case.

6. Debtor(s) pray(s) that case be continued and that he/she/they be allowed to continue pursuit of workout options namely loan modification, as they have been approved for such.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, that I am subject to punishment.

Dated: March 10, 2017

Mitchell Law Offices

/s/ Douglas G. Mitchell
By: Douglas G. Mitchell